

*****CONFIDENTIAL DEPOSITION*****

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Leighton Technologies, LLC,)

Plaintiff-Counterclaim)

Defendant,)Case No.

-vs-)04Civ

Oberthur Card Systems, S.A.,)2496(CM)

Defendant-Counterclaim)

Plaintiff.)

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Deposition of KEITH R. LEIGHTON, a
witness herein, called by the Defendant-
Counterclaim Plaintiff, as if upon
cross-examination under the statute, and
taken before Luanne Stone, a Notary Public
within and for the State of Ohio, pursuant
to the issuance of notice and subpoena, and
pursuant to the further stipulations of
counsel herein contained, on Sunday, the 9th
day of October, 2005 at 9:00 o'clock A.M.,
at the Renaissance Hotel, the City of
Cleveland, the County of Cuyahoga and the
State of Ohio.

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Tackla
& Associates

Court Reporting & Videotaping

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1 A Correct.

2 Q Okay, and now I'm asking you: When is
3 the first time you made a plastic laminated
4 card in which the pressure during the
5 cooling phase was at least ten percent
6 greater than the pressure during the heating
7 phase?

8 MR. GUTKIN: Vague and ambiguous.

9 BY MR. JACOBS:

10 Q You can answer the question.

11 A I'm not sure what you're trying to get
12 at here.

13 Q Do you understand the question?

14 A When was the first time that I made a
15 plastic card where I increased the pressure
16 during the cooling cycle?

17 Q That's exactly right, by at least ten
18 percent.

19 A I may have done that back in 1970. I'm
20 not sure. I'm not sure. Like I say,
21 different plastic, depending upon what is
22 printed on the sheets, required different
23 temperatures.

24 Q Sir, have you ever made a plastic
25 laminated card where you increased the